

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3
4 UNITED STATES OF AMERICA,

5 Plaintiff,

6 vs.

7 YOANY VAILLANT,

8 a/k/a Yoany Vaillant Fajardo,

9 Defendant.

) CASE NO.: 2:22-CR-00030-RFB-DJA-7

)
)
) **STIPULATION TO CONTINUE THE**
) **PROPOSED VOIR DIRE, JURY**
) **INSTRUCTIONS, VERDICT FORM,**
) **WITNESS LISTS, EXHIBIT LISTS AND**
) **TRIAL BRIEFS DEADLINE PURSUANT**
) **TO ECF 518**
)

10
11 COMES NOW, the Defendant, YOANY VAILLANT, by and through his attorney,
12 CHRISTOPHER R. ORAM ESQ.; and the Plaintiff, United States of America, by and through
13 its counsel, Jason M. Frierson, United States Attorney, through Jessica Oliva, Assistant United
14 States Attorney, Nicole M. Argentieri, Principal Deputy Assistant Attorney General, through
15 Matthew A. Lamberti, Senior Counsel, and Michael Christin, Trial Attorney; hereby stipulate
16 and agree to continue the deadline for Proposed Voir Dire, Jury Instructions, Verdict Form,
17 Witness Lists, Exhibit List and Trial Briefs from the due date of September 24th 2024 (ECF
18 518) to a new date of October 1st 2024 for both of the parties involved.

19 The parties enter this stipulation for the following reasons:

20 1. Good cause exists to continue the Proposed Voir Dire, Jury Instructions, Verdict
21 Form, Witness Lists, Exhibit Lists and Trial Briefs from the due date of September 24th 2024
22 (ECF 518) to a seven (7) day extension to October 1st 2024.

23 2. Defense Counsel is currently scheduled to submit a reply brief in the Supreme Court
24 for Mr. Brenton Smith case No. 87664. Brenton Smith was convicted of second-degree murder

1 with use of a deadly weapon. The Court sentenced Mr. Smith on August 28, 2019, as follows:
2 ten (10) to twenty-five (25) years in the Nevada Department of Corrections, plus a consecutive
3 term of sixty (60) to one hundred fifty (150) months for the use of a deadly weapon.

4 3. Additionally, counsel for Mr. Yoany Vaillant is working on completing The Opening
5 Brief and Excerpts of Record for Mr. Lee Reed in the Ninth Circuit for case No. 24-476. The
6 Opening Brief and Excerpts of Record regarding Mr. Reeds case is due September 25, 2024.
7 Mr. Reed is currently serving life in prison with a minimum of two hundred forty (240) months
8 plus a consecutive term of forty-eight (48) to two hundred forty (240) months for murder with
9 the use of a deadly weapon.

10 4. The parties' proposed stipulation to continue the Proposed Voir Dire, Jury
11 Instructions, Verdict Form, Witness Lists, Exhibit Lists, and Trial Briefs from the due date of
12 September 24th 2024 (ECF 518) to a new date of October 1st 2024 would apply to both parties in
13 this case.

14 5. Thus, good cause exists to continue the deadline pursuant to ECF 518 by an additional
15 7 (seven) days to ensure both parties are afforded ample time to complete the Proposed Voir
16 Dire, Jury Instructions, Verdict Form, Witness Lists, Exhibit Lists and Trial Briefs.

17 Respectfully submitted this 20th day of September, 2024.

18
19 Respectfully submitted:

20 The Law Office of Christopher R. Oram, Esq.
21 CHRISTOPHER R. ORAM, ESQ.
22 /s/ Christopher R. Oram.
Attorney for Yoany Vaillant

IT IS SO ORDERED
this 20th day of 2024.



1 JASON M. FRIERSON

2 *United States Attorney*

3 RICHARD ANTHONY LOPEZ

JESSICA OLIVA

4 Assistant United States Attorneys

5 NICOLE M. ARGENTIERI

Principal Deputy Assistant Attorney General

6 Head of the Criminal Division

7 MATTHEW A. LAMBERTI

Senior Counsel

8 MICHAEL CHRISTIN

9 Trial Attorney

United States Department of Justice

CERTIFICATE OF SERVICE

I certify that I am an employee of the Law Office of Christopher R. Oram, and that on this 20th day of September, 2024, I served a copy of the foregoing **STIPULATION TO CONTINUE THE PROPOSED VOIR DIRE, JURY INSTRUCTIONS, VERDICT FORM, WITNESS LIST, EXHIBIT LISTS, AND TRIAL BRIEFS DEADLINE PURSUANT TO ECF 518** by ECF electronic filing to:

U.S. ATTORNEY'S OFFICE AND DOJ:

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